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May 16, 2025

By ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Baker-Pacius, et al. v. The Dep't of Education of the City of New York, et al.
25-cv-00743 (AMD)(JAM)

Dear Judge Marutollo:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, attorney for the defendants, the Department of Education of the City of New York ("DOE"), Melissa Aviles-Ramos, and Katherine Rodi (collectively, "Defendants"), in the above- referenced action. I write to respectfully request an extension of time, from May 20, 2025 to July 20, 2025, for Defendants to respond to the Amended Complaint. This is Defendants' first request for an extension of time to respond to the Amended Complaint, and the requested extension does not affect any scheduled dates. *Pro se* plaintiffs have consented to the requested extension.

The Amended Complaint in this matter contains numerous allegations of discrimination and various constitutional violations against the DOE and the individually-named Defendants. Additional time is needed to collect and review documents in order to appropriately respond to the Amended Complaint, and to speak with potential witnesses concerning the allegations contained therein.

Therefore, this Office respectfully requests that the Court grant the request for an extension of Defendants' time to respond to the Amended Complaint to July 20, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Kathleen M. Linnane

Kathleen M. Linnane
Senior Counsel

Cc: All parties (via ECF)

Diane Baker-Pacius, *pro se* plaintiff, via USPS to 55 West 116th Street, Ste. 396, New York, NY 10026, and via email to DBCB.CG.2025@gmail.com

Christopher J. Garry, *pro se* plaintiff, via USPS to 75-27 217 Street, Oakland Garden, NY 11364, and via email to DBCB.CG.2025@gmail.com